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7	Proposed Attorneys for the Debtor				
8	UNITED STATES BANKRUPTCY C	COURT	FOR THE DISTRICT OF NEVADA		
10	In re:)	Case No. 15-13475-ABL		
11	Erick Allan Lindgren,)	Chapter 11		
13	Debtor.)	Hearing Date: OST Pending		
14)	Hearing Time: OST Pending		
15	MOTION FOR AN ORDER OR A	— <i>)</i>	CO MAND DEPOSED A DEVENOVA A		
16	MOTION FOR AN ORDER GRA TIME WITHIN WHICH TO FII		HEDULES AND STATEMENTS		
17 18	Erick Allan Lindgren, the debtor and debtor-in-possession (the " Debtor ") in the above				
19	captioned case, hereby moves this Court (the "Motion") for the entry of an order granting the				
20	Debtor additional time within which to file schedules and statements. In support of this				
22	Motion, the Debtor respectfully states as follows.				
23	Jurisdiction				
24					
25	1. This Court has jurisdiction over this Motion under 28 U.S.C. § 1334. This				
26	matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this				
27	proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.				
29	2. The statutory bases for the relief requested herein are sections 105(a) and 521 of				
30	the United States Code, 11 U.S.C. §§ 101, et seq. (as amended, the "Bankruptcy Code") and				
31					
32	Fed. R. Bankr. P. 1007(a)(4) and (c).				

Background

- 3. On June 16, 2015 (the "**Petition Date**"), the Debtor filed his voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
- 4. The Debtor continues to operate his business and manage his properties as a debtor-in-possession. No creditor's committee has been appointed in this case by the United States Trustee.

Relief Requested

5. By this Motion, the Debtor seeks the entry of an Order extending the time within which the Debtor is required to file its schedules of assets and liabilities, lists of equity holders, schedules of executory contracts and unexpired leases and statements of financial affairs (collectively, the "Schedules and Statements").

Basis for Relief

- 6. The Debtor filed this case on an emergency basis due to imminent garnishments against his earnings. Specifically, the Debtor is a professional poker player residing in Las Vegas, Nevada, and often plays in poker tournaments at the Rio All Suites Hotel and Casino in Las Vegas, Nevada (the "Rio"), including the upcoming World Series of Poker. Prior to the Petition Date, however, the Rio did not turn over poker earnings to the Debtor due to pending garnishments against him.
- 7. On the Petition Date, the Debtor filed a skeletal petition that lists only the pertinent information necessary to file this Chapter 11 case, and has not been able to assemble those pertinent documents and financial information necessary to complete the Schedules and Statements.

 8. Due to the number of creditors, and the emergency nature by which the Debtor needed to file, the fourteen-day automatic extension of time to file the Schedules provided by Bankruptcy Rule 1007(c) will not be sufficient to permit completion of the Schedules. Accordingly, the Debtor requires additional time to assemble the information necessary to complete the Schedules and Statements.

9. At this juncture, the Debtor estimates that **thirty one additional days** (**for a total of forty-five days**) from the Petition Date, or July 31, 2015, will provide sufficient time to prepare and file the Schedules and Statements. As a result, the Debtor requests that the Court grant such an extension, without prejudice to the Debtor's right to seek any further extensions from the Court, to file all Schedules and Statements not previously filed, pursuant to Fed. R. Bankr. P. 1007(b) and (c), or to seek waivers with respect to the filing of certain Schedules and Statements.

Notice

10. Notice of this Motion has been given to: (i) the United States Trustee; (ii) the Debtor's top 20 largest creditors; and (iii) certain governmental agencies including the Internal Revenue Service, the Clark County Assessor, the Clark County Treasurer and the Nevada Department of Taxation. In light of the nature of the relief requested, the Debtor submits that no further notice is required.

No Prior Request

11. No prior motion for the relief requested herein has been made to this or any other Court.

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WHEREFORE, the Debtor respectfully requests that the Court enter an Order (1) granting the Debtor additional time within which to file Schedules and Statements, as set forth in the order attached hereto as **Exhibit A**, and (2) granting such other and further relief as the Court deems appropriate. Dated this 19th day of June, 2015. Respectfully Submitted, /s/ Samuel A. Schwartz Samuel A. Schwartz, Esq. Nevada Bar No. 10985 Bryan A. Lindsey, Esq. Nevada Bar No. 10662 Schwartz Flansburg PLLC 6623 Las Vegas Blvd. South, Suite 300 Las Vegas, Nevada 89119 Telephone: (702) 385-5544 Facsimile: (702) 385-2741 Proposed Attorneys for the Debtor

CERTIFICATE OF SERVICE 1 2 I HEREBY CERTIFY that a true and correct copy of the foregoing was sent 3 electronically via the Court's CM/ECF system on June 19, 2015, to the following: 4 5 U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov 6 I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Regular 7 U.S. Postal Mail on June 19, 2015 to the following: 8 9 Internal Revenue Service Ally Financial 10 P.O. Box 7346 200 Renaissance Center Detriot, MI 48243 Philadelphia, PA 19101-7346 11 12 Clark County Treasurer Ally Financial c/o Bankruptcy Clerk P.O. Box 951 13 500 S Grand Central Parkway Horsham, PA 19044 14 PO Box 551220 Las Vegas, NV 89155-1220 Amaya Gaming 15 c/o Ifrah Law, PLLC 16 Clark County Assessor 1717 Pennsylvania Ave. NW c/o Bankruptcy Clerk Washington, DC 20006 17 500 S Grand Central Pkwy 18 Box 551401 Andy Bloch Las Vegas, NV 89155-1401 64 Promontory Ridge 19 Las Vegas, NV 89135 20 Dept of Employment, Training and Rehab **Employment Security Division** 21 Bill Elder 500 East Third Street 2015 Lookout Point Circle 22 Carson City, NV 89713 Las Vegas, NV 89117 23 United States Trustee Cary Katz 24 300 Las Vegas Blvd. South #4300 10100 W. Charleston Blvd. 25 Las Vegas, NV 89101 Suite 130 Las Vegas, NV 89138 26 Nevada Dept of Taxation, BK Section 27 555 E. Washington Ave. #1300 CS RMR, LLC Las Vegas, NV 89101 c/o Frank Perez, Esq. 28 McCullough, Perez & Associates, Ltd. 29 State of Nevada Dept. of Motor Vehicles 601 S. Rancho Drive, A-10 Attn: Legal Division Las Vegas, NV 89101 30 555 Wright Way 31 Carson City, NV 89711

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